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August 30, 2007

### VIA ELECTRONIC FILING AND HAND DELIVERY

The Honorable Joseph J. Farnan, Jr.  
United States District Court  
844 N. King Street  
Wilmington, Delaware 19801

Re: *Wells Fargo Bank N.A. v. Royal*, Civil Action No. 02-1294-JJF

*Charles A. Stanziale, Jr., Chapter 7 Trustee of Student Finance Corp. v. Pepper Hamilton, et al.*, Civil Action No. 04-1551-JJF

*Charles A. Stanziale, Jr., Chapter 7 Trustee of Student Finance Corp. v. McGladrey & Pullen LLP, et al.*, Civil Action No. 05-72-JJF

*Royal v. Pepper Hamilton, et al.*, Civil Action No. 05-165-JJF

Dear Judge Farnan:

We are counsel for Royal Indemnity Company ("Royal") in the above-referenced matters currently pending before Your Honor. Today, Royal filed the enclosed emergency motion to compel production of certain documents withheld by defendants Pepper Hamilton LLP and Roderick Gagné (together, "Pepper"). The basis for Royal's motion is that two of Pepper's expert witnesses stated at their depositions that they had been provided certain materials utilized in connection with the preparation of their expert reports. The expert reports did not disclose these materials, and Pepper has refused to produce them in response to Royal's express requests. Royal's memorandum in support of its motion sets forth in detail the nature of these documents and why production is warranted.

By order of this Court, expert discovery closes on September 5, 2007, and indeed, the pretrial conference for these cases is scheduled for October 4, 2007; therefore, it is imperative that Pepper produce these documents without delay. If Royal is not permitted access to these materials, it will be prejudiced in its ability to fully cross-examine these experts regarding their opinions. Therefore, Royal respectfully requests that the Court grant its emergency motion and compel Pepper to produce the requested documents as soon as possible.

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We are available should the Court have any questions or concerns.

Respectfully submitted,

*/s/ Tiffany Geyer Lydon*

Tiffany Geyer Lydon

cc: Counsel of record on attached service list

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